

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
McMANIMON, SCOTLAND & BAUMANN, LLC 75 Livingston Avenue, Suite 201 Roseland, NJ 07068 (973) 622-1800 Anthony Sodono III (asodono@msbnj.com) Sari B. Placona (splacona@msbnj.com) <i>Counsel to Daryl Fred Heller</i> <i>Chapter 11 Debtor and Debtor-in-Possession</i>	
In re:	Case No. 25-11354 (JNP)
DARYL FRED HELLER,	Chapter 11
Debtor.	

**SUPPLEMENTAL CERTIFICATION IN SUPPORT OF APPLICATION
FOR RETENTION AS COUNSEL TO DEBTOR/DEBTOR-IN-POSSESSION**

I, **SARI B. PLACONA**, being of full age, hereby certify as follows:

1. On February 11, 2025, by application, Daryl Fred Heller, Chapter 11 Debtor and Debtor-in-Possession (the “Debtor”), sought to retain my firm, McManimon, Scotland & Baumann, LLC (“MSB”) as counsel to the Debtor (“MS&B Retention”). [Doc No. 7]
2. On March 31, 2025, the Court entered an order authorizing the Debtor to employ MSB as counsel. [Doc. No. 138]
3. I hereby supplement my certification in support of the MSB Retention to include the following:
 - a. The services to be rendered to the Debtor are expanded to include representation of the Debtor in connection with the appeal action pending in the Court of Common Pleas of Lancaster County, PA, entitled, *Prestige Fund A, LLC v. Paramount Management Group, LLC*, Case No. CI-24-06012 (the “Appeal Action”).
 - b. In connection with the Appeal Action, MSB received a retainer in the amount of \$10,000. The \$10,000 payment was obtained from the Debtor’s 401k funds.

I declare under penalty of perjury that the foregoing is true and correct.

**McMANIMON, SCOTLAND &
BAUMANN, LLC**

Dated: August 13, 2025

By: /s/ Sari B. Placona
Sari B. Placona